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April 15, 2021

VIA ECF

The Honorable Sidney H. Stein, U.S.D.J.  
U.S. District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

Re: Tatum-Rios v. Work LA, LLC 1:21-cv-01164 (SHS)

Dear Judge Stein:

We represent the Plaintiff in this website accessibility case under Title III of the American's with Disabilities Act, and its New York State and City analogs. We write now to respectfully request a 45-day adjournment of the Initial Pretrial Conference ("IPTC"), currently scheduled for April 20, 2021 at 10:30am. (Dkt. 5.)

Plaintiff filed this action on February 9, 2021 (Dkt. 1.) and has until May 10, 2021 to serve Defendant pursuant to Fed. R. Civ. P. 4. To date, Plaintiff has made two good faith, albeit unsuccessful attempt to serve the Summons and Complaint on this California-based defendant at two different addresses. We are currently conducting a Corporate Search to identify an alternative address and will again attempt service prior to the May 10<sup>th</sup> deadline. As Defendant has not been served, and we would like the opportunity to explore a potential early resolution of this matter prior to expending judicial resources, Plaintiff respectfully requests a 45-day adjournment of the IPTC to facilitate service and Defendant's appearance in the case.

This is the first request for an adjournment of the IPTC. As Defendant has not yet appeared in the case and we have not been contacted by their counsel, we are unable to determine whether Defendant consents to this request. If granted, this adjournment will not affect any other case deadlines because no Scheduling Order has yet been entered.



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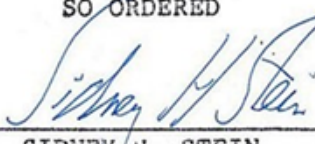
We appreciate the Court's consideration of this request.

Respectfully submitted,  
LIPSKY LOWE LLP

s/ Christopher H. Lowe  
Christopher H. Lowe

The conference is adjourned to June 10, 2021, at 11:00 a.m.

Dated: New York, New York  
April 15, 2021

SO ORDERED  
  
SIDNEY H. STEIN  
U.S.D.J.